Case 1:20-cr-00652-VM Document 318 Filed 09/28/23 Page 1 of 1

JAMES KOUSOUROS

James Kousouros FOUNDER & PRINCIPAL

260 Madison Avenue, 22nd floor • New York, NY 10016 212 • 532 • 1934 / 212 • 532 • 1939 fax E-mail: James@kousouroslaw.com

EVAN L. LIPTON COUNSEL

EMMA J. COLE LEGAL ASSISTANT

September 26, 2023

By ECF

Hon. Victor Marrero United States District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 09/27/2023

Re: United States v. Narek Marutyan, et al., 20 Cr. 652 (VM)

Dear Judge Marrero:

This letter is respectfully submitted to request that the Court modify the conditions of Mr. Marutyan's bond to permit him to travel within the continental United States for employment purposes. Mr. Marutyan is currently limited in his employment as he cannot accept long distance trucking jobs given his travel restrictions.

Pretrial Services Officer Francesca Piperato has no objection to the instant request provided Mr. Marutyan continue to provide proof of employment and provides proof of travel for employment purposes in advance. The Government defers to the position of Pretrial Services.

Thus, we respectfully request that the Court modify the conditions of Mr. Marutyan's bond to permit him to travel within the continental United States for employment purposes.

Thank you for your consideration.

Respectfully submitted,

/s/ James Kousouros

James Kousouros, Esq.

c.c.

Emily Deininger Assistant United States Attorney

Francesca Piperato Pretrial Services Officer

